

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	No. 1:19cr362
)	
BRIAN M. CARPENTER,)	
Defendant.)	

**GOVERNMENT'S RESPONSE TO DEFENDANT'S
MOTION TO MODIFY CONDITIONS OF RELEASE**

The United States of America, by and through its undersigned counsel, hereby responds to the defendant's motion to modify conditions of release.

On January 28, 2020, counsel for the government and the defendant met and conferred regarding the instant motion. As a result of that teleconference, the parties agree (and the United States does not object) to the Court modifying the defendant's conditions of release to permit him to travel within the United States, with prior notification to Pretrial Services or the Court.

Accordingly, the United States respectfully requests that the Court enter an amended order modifying the defendant's conditions of release, specifically condition (f), to signify that the defendant is permitted to travel within the United States only with prior notification to Pretrial Services or the Court. If the Court is so inclined, the parties further agree that this resolution should obviate the need for the hearing previously set by this Court for Friday, January 31, 2020.

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

By: _____/s/_____
Jamar K. Walker
Heidi B. Gesch
Assistant United States Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of January, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

_____/s/_____
Jamar K. Walker
Assistant United States Attorney